IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re: Chapter 11

FORMER BL STORES, INC., et al. Case No. 24-11967 (JKS)

Debtors.

(Jointly Administered)

NOTICE OF APPEARANCE AND **DEMAND FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby enter their appearance for Gisele Bundchen in the above-captioned case and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Sections 1109(b) and 342 of Title 11 of the United States Code, as amended, that all notices given in the above-captioned case and all papers served or required to be served in the above-captioned case be given to and served upon the undersigned attorneys, at the addresses set forth below:

> GELLERT SEITZI BUSENKELL & BROWN, LLC Ronald S. Gellert, Esq. Margaret M. Manning, Esq. 1201 North Orange Street, Suite 300 Wilmington, DE 19801 Telephone: (302) 425-5800 rgellert@gsbblaw.com

> > mmanning@gsbblaw.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Code or Bankruptcy Rules, but also includes, without limitation, orders and notices of any applications, motions, orders, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, and any other document brought before this Court with respect to the Bankruptcy Case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail,

hand delivery, telephone, facsimile, telex, e-mail or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive Ms.

Bundchen's (i) right to have final orders in non-core matters entered only after de novo review by

a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case,

controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United

States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other

rights, claims, actions, defenses, setoffs or recoupments to which Ms. Bundchen is or may be

entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs,

and recoupments expressly are hereby reserved.

Dated: November 13, 2025

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Margaret M. Manning

Ronald S. Gellert (DE 4259)

Margaret M. Manning (DE 4183)

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CERTIFICATE OF SERVICE

I, Margaret M. Manning, Esq., hereby certify that on November 13, 2025, I caused a true

and correct copy of the foregoing Notice of Appearance and Demand for Service of Notices and

Papers to be electronically filed and served through the Court's CM/ECF system which will send

notification that such filing is available for viewing and downloading to all registered participants.

Dated: November 13, 2025

/s/ Margaret M. Manning

Margaret M. Manning (DE 4183)